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XTO Energy

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65725 - R8 CAA

March 29, 2018

CERTIFIED MAIL # 7017 2400 0000 6989 5288

U.S. Environmental Protection Agency, Region 8
Office of Enforcement, Compliance & Environmental Justice
Air Toxics and Technical Enforcement Program, 8ENF-AT
U.S. Environmental Protection Agency
1595 Wynkoop Street
Denver, Colorado 80202

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APR 3 - 2018

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RE: **XTO Energy Inc.**
2017 Title V Annual Compliance Certification
Little Canyon Unit Compressor Station
Uintah County, UT

Office of
Compliance & Environmental Justice

Office of Enforcement
Compliance & Environmental Justice

To Whom It May Concern:

XTO Energy, Inc. (XTO) respectfully submits the Title V Annual Compliance Certification covering calendar year of 2017. The report covers the Little Canyon Unit Compressor Station (V-UO-000016-2006.00).

Attached are the Annual Compliance Certification form (a-comp), and the Certification of Truth, Accuracy, and Completeness (CTAC). Should you have any questions, please feel free to contact me at 817-885-6872 or via e-mail at ethan_boor@xtoenergy.com.

Sincerely,

Ethan Boor
Environmental Engineer
XTO Energy Inc.



OMB No. 2060-0336,
Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)
CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) _____Herman_____ (First) _____Timothy_____ (MI) _____L_____

Title _____XTO Energy Inc. Manager Midstream Operations_____

Street or P.O. Box _____810 Houston St. _____

City _____Fort Worth_____ State TX ZIP 76102_ - _____

Telephone (817) 885 - 2584 Ext. _____ Facsimile (817) 870 -8441

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) _____

Name (typed) _____Timothy L. Herman_____ Date: _03/_29_/2018

Federal Operating Permit Program (40 CFR Part 71)
ANNUAL COMPLIANCE CERTIFICATION (A-COMP)

A. GENERAL INFORMATION

Permit No. V-U0-000016-2006.00

Reporting Period: Beg.01 / 01 / 2017 End.12 / 31 / 2017

Source / Company Name: Little Canyon Unit Compressor Station / XTO Energy Inc. _____

Mailing Address: Street or P.O. Box 810 Houston St. PTR-4

City Fort Worth State TX ZIP 76102- _____

Contact person Ethan Boor Title Environmental Engineer

Telephone (817) 885 – 6872 Ext. _____

Continued on next page

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

C. Glycol Dehydration Unit Process Vent Standards [40 CFR 63.765]

1. Except as specified in §63.765(c), the Permittee shall comply with the applicable requirements for controlling air emissions specified in §63.765(b);

Compliance Methods for the Above (Description and Citation):

The glycol dehydration unit at the facility is controlled by a thermal oxidizer (closed vent system), and are designed and operated in accordance with the requirements of §63.771(c) and §63.771(d).

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

C. Glycol Dehydration Unit Process Vent Standards [40 CFR 63.765]

2. For each closed-vent system, the Permittee shall comply with the closed-vent system requirements specified in §63.771(c);

Compliance Methods for the Above (Description and Citation):

The closed-vent system at the facility meets the closed-vent system requirements of §63.771 (c). Vapors are routed to a thermal oxidizer, and the facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature for achieving 95% destruction.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

C. Glycol Dehydration Unit Process Vent Standards [40 CFR 63.765]

3. For each control device, the Permittee shall comply with the applicable control device requirements specified in §63.771(d) or §63.771(f);

Compliance Methods for the Above (Description and Citation):

The thermal oxidizer at the facility meets the requirements of §63.771(f). The control device as a manufacturer certification.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

C. Glycol Dehydration Unit Process Vent Standards [40 CFR 63.765]

4. - For each process modification made to comply with the glycol dehydration unit process vent standards at §63.765(c)(2), the Permittee shall comply with the process modification standards specified in §63.771(e).

Compliance Methods for the Above (Description and Citation):

The thermal oxidizer at the facility is manufacturer certified and designed to meet a guaranteed 95% control efficiency while operating at a specified temperature range. XTO constantly monitors the TO temperature to ensure compliance. The facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature. The facility is in compliance with the process vent standards of §63.765(c)(2) and the modification standards of §63.771(e).

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

D. Test Methods, Compliance Procedures, and Compliance Determination Requirements [40 CFR 63.772]

The Permittee shall determine compliance with the requirements of 40 CFR part 63, subpart HH using the applicable test methods and compliance procedures specified in §63.772.

Compliance Methods for the Above (Description and Citation):

A detectable emissions test procedure is conducted annually at the facility in accordance with Method 21, 40 CFR part 60, appendix A. XTO uses the applicable test methods and compliance procedures specified in §63.772.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

E. Inspection and Monitoring Requirements [40 CFR 63.773]

1. For each closed-vent system or cover required for the Permittee to comply with 40 CFR part 63, subpart HH, the Permittee shall comply with the inspection and monitoring requirements specified in §63.773(c).

Compliance Methods for the Above (Description and Citation):

Vapors are routed to a thermal oxidizer, and the facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature for achieving 95% destruction efficiency. The closed vent system

is inspected annually in accordance with Method 21, 40 CFR part 60, appendix A. Inspections of the facility are completed semi-annually or more frequently, and maintenance/replacement of control device components is made as necessary. The facility is in compliance with the requirements of §63.773(c).

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

E. Inspection and Monitoring Requirements [40 CFR 63.773]

2. For each control device required for the Permittee to comply with 40 CFR part 63, subpart HH, the Permittee shall comply with the inspection and monitoring requirements as specified in §63.773(b) or §63.773(d).

Compliance Methods for the Above (Description and Citation):

Vapors are routed to a thermal oxidizer, and the facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature for achieving 95% destruction efficiency. The closed vent system is inspected annually in accordance with Method 21, 40 CFR part 60, appendix A. Inspections of the facility are completed semi-annually or more frequently, and maintenance/replacement of control device components is made as necessary. The facility is in compliance with the requirements of §63.773(d).

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

F. Recordkeeping Requirements [40 CFR 63.774]

1. The recordkeeping provisions of 40 CFR part 63, subpart A that apply and those that do not apply to the Permittee are listed in Table 2 of 40 CFR part 63, subpart HH.

Compliance Methods for the Above (Description and Citation):

The facility complies with the recordkeeping requirements of 40 CFR part 63, subpart HH.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

F. Recordkeeping Requirements [40 CFR 63.774]

2. The Permittee shall maintain the records specified in §§63.774(b), (c), (d), (e), (g), and (h).

Compliance Methods for the Above (Description and Citation):

The facility maintains the applicable records, as required in §63.774. Proper operational maintenance is monitored constantly with a thermocouple & the facility is inspected every other day.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

F. Recordkeeping Requirements [40 CFR 63.774]

3. Except as specified in §§63.774(c), 63.774(d), and 63.774(f), the Permittee shall maintain the records specified in §63.774(b).

Compliance Methods for the Above (Description and Citation):

The facility maintains the applicable records, as required in §63.774.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

F. Recordkeeping Requirements [40 CFR 63.774]

4. If compliance with the benzene emission limit specified in §63.765(b)(1)(ii) is elected, the Permittee shall document, to the Administrator's satisfaction, the items in §63.774(c).

Compliance Methods for the Above (Description and Citation):

Glycol circulation rates are tracked on a daily inspection (every other day).

Status (Check one): ☒ Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

F. Recordkeeping Requirements [40 CFR 63.774]

5. For glycol dehydration units operating at the source that meet the exemption criteria in §63.764(e)(1)(i) or §63.764(e)(1)(ii), the Permittee shall maintain records as specified in §63.774(d).

Compliance Methods for the Above (Description and Citation):

The facility maintains the applicable records, as required in §63.774.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

F. Recordkeeping Requirements [40 CFR 63.774]

6. The Permittee shall keep records of the requirements of §63.774(e) when using a flare to comply with §63.771(d).

Compliance Methods for the Above (Description and Citation):

Vapors are routed to a thermal oxidizer, and the facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature for achieving 95% destruction efficiency

Status (Check one): ☐ Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

F. Recordkeeping Requirements [40 CFR 63.774]

7. The Permittee shall maintain records, pursuant to §63.774(g), of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control equipment and monitoring equipment. The Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with §63.764(j), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

Compliance Methods for the Above (Description and Citation):

Vapors are routed to a thermal oxidizer, and the facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature for achieving 95% destruction efficiency. All periods of malfunctions or downtime are monitored and recorded along with the reason for the malfunction. Temperature readings are recorded every 15 minutes annually. The facility maintains records in compliance with §63.774(g).

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

F. Recordkeeping Requirements [40 CFR 63.774]

8. The Permittee shall keep records of the requirements of §63.774(h) when using a control device whose model is tested under §63.772(h) to comply with §§63.771(d), (e)(3)(ii) and (f)(I).

Compliance Methods for the Above (Description and Citation):

The facility is in compliance with the recordkeeping requirements of §63.774.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

F. Recordkeeping Requirements [40 CFR 63.774]

9. The Permittee shall keep records, pursuant to §63.774(i), of the date the semi-annual maintenance inspection required under §63.773(b) is performed when using a control device whose model was tested under §63.772(h).

Compliance Methods for the Above (Description and Citation):

Records are maintained in accordance with §63.774(i).

Status (Check one): ☒ Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

G. Reporting Requirements [40 CFR 63.775]

1. The reporting provisions of subpart A of this part, that apply and those that do not apply to the Permittee are listed in Table 2 of this subpart.

Compliance Methods for the Above (Description and Citation):

The facility is in compliance with the reporting provisions of Table 2.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

G. Reporting Requirements [40 CFR 63.775]

2. The Permittee shall submit the information specified in §63.775(b).

Compliance Methods for the Above (Description and Citation):

Reports for the facility are submitted in accordance with §63.775(b).

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

G. Reporting Requirements [40 CFR 63.775]

3. The Permittee shall submit Notification of Compliance Status Reports as specified in §63.775(d).

Compliance Methods for the Above (Description and Citation):

Reports for the facility are submitted in compliance with §63.775(d).

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

G. Reporting Requirements [40 CFR 63.775]

4. The Permittee shall submit Periodic Reports as specified in §63.775(e).

Compliance Methods for the Above (Description and Citation):

Periodic reports are submitted for the facility in compliance with §63.775(e).

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

G. Reporting Requirements [40 CFR 63.775]

5. The Permittee shall submit notifications of process changes as specified in §63.775(f).

Compliance Methods for the Above (Description and Citation):

For any process changes, the facility will comply with the notification requirements of §63.775(f). No process modifications have been made.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

G. Reporting Requirements [40 CFR 63.775]

6. The Permittee shall comply with any applicable electronic reporting provisions specified at §63.775(g).

Compliance Methods for the Above (Description and Citation):

Electronic reports are submitted in accordance with §63.775(g).

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ -C. Work, Operation and Management Practices

1. The permittee shall comply with the applicable 40 CFR part 63, subpart ZZZZ operating limitations and other requirements at all times. [40 CFR 63.6605(a)]

Compliance Methods for the Above (Description and Citation):

Subject engines are in compliance with operating limitations and other requirements of 40 CFR 63.6605(a) at all times.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ -C. Work, Operation and Management Practices

2. The permittee shall change the oil and filter and inspect and replace as necessary all spark plugs, hoses and belts every 1,440 hours of operation or annually, whichever comes first. [40 CFR 63.6603(a) and Table 2d of 40 CFR, subpart ZZZZ]

Compliance Methods for the Above (Description and Citation):

The facility utilizes an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis is performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ -C. Work, Operation and Management Practices

4. The permittee shall operate and maintain the stationary RICE according to the manufacture's emission-related operation and maintenance instructions or the permittee may develop and follow the permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practices for minimizing emissions. [40 CFR 63.6640(a), 40 CFR 63.6625(e)(8), and Table 6 of 40 CFR 63, subpart ZZZZ]

Compliance Methods for the Above (Description and Citation):

The engines are operated and maintained to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practices for minimizing emissions.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ -C. Work, Operation and Management Practices

5. During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63.6603, 40 CFR 63.6625(h) and Table 2d of 40 CFR 63, subpart ZZZZ]

Compliance Methods for the Above (Description and Citation):

During startup, engine's time spent at idle is minimized p to a period needed for appropriate and safe loading of the engine, which does not to exceed 30 minutes.

Status (Check one): ☒ Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ -C. Work, Operation and Management Practices

6. At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions to the levels required by 40 CFR part 63, subpart ZZZZ. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if the required levels have been achieved. Determination of whether such operations and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records and inspection of the source. [40 CFR 63.6605(b)]

Compliance Methods for the Above (Description and Citation):

Subject engines at the Facility are operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions to the levels required by 40 CFR part 63, subpart ZZZZ to meet requirements of rule 40 CFR 63.6605(b).

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ - D. Continuous Compliance Requirements

1. The permittee shall demonstrate continuous compliance with the applicable operating limitations and other requirements in Table 2d according to the methods specified in Table 6 of 40 CFR part 63, subpart ZZZZ. [40 CFR 63.6605(a) and 40 CFR 63.6640(a)]

Compliance Methods for the Above (Description and Citation):

Subject engines are operated in accordance with the applicable regulations in Table 2d according to the methods specified in Table 6 of 40 CFR part 63, subpart ZZZZ. [40 CFR 63.6605(a) and 40 CFR 63.6640(a)]

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ - D. Continuous Compliance Requirements

2. The permittee must report each instance in which an operating limit was not met. These instances are deviations from the operating limitations and must be reported according to the reporting requirements of §63.6650(l) and the Facility-Wide Reporting Requirements section of this permit. [40 CFR 63.6640(b)]

Compliance Methods for the Above (Description and Citation):

Reports of each operating limit that was not met shall be available for any instances of deviations.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ - D. Continuous Compliance Requirements

3. The permittee must also report each instance in which the requirements in Table 8 of 40 CFR part 63, subpart ZZZZ, were not met. [40 CFR 63.6640(e)]

Compliance Methods for the Above (Description and Citation):

Reports from each deviation instance for the requirements of Table 8 of 40 CFR part 63, subpart ZZZZ shall be submitted.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ - E. Recordkeeping Requirements

1. The permittee must keep the following records to comply with the 40 CFR part 63, subpart ZZZZ operating limitations:

- (a) A copy of each notification and report that was submitted to comply with 40 CFR part 63, subpart ZZZZ.
- (b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment).
- (c) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process to its normal or usual manner of operation.

[40 CFR 63.6655(a)]

Compliance Methods for the Above (Description and Citation):

Records of each notification and report submitted, duration of malfunctions, reason for malfunctions and corrective actions are maintained in accordance with the requirements of this permit.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ - E. Recordkeeping Requirement

2. The permittee must keep the records required in Table 6 of 40 CFR part 63, subpart ZZZZ to show continuous compliance with each operating limitation that applies.

[40 CFR 63.6655(d)]

Compliance Methods for the Above (Description and Citation):

Records are maintained for Table 6 of 40 CFR part 63, subpart ZZZZ to show continuous compliance with each operating limitation that applies.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ - E. Recordkeeping Requirement

3. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the stationary RICE is operated and maintained according to the manufacturer's or the permittee's own maintenance plan.

[40 CFR 63.6655(d) and (e), and Table 6 of 40 CFR 63, subpart ZZZZ]

Compliance Methods for the Above (Description and Citation):

Records of the maintenance done on each engine are maintained in accordance with 40 CFR 63.6655(d) and (e), and Table 6 of 40 CFR 63, subpart ZZZZ.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ - E. Recordkeeping Requirement

4. The permittee must keep each record in a form suitable and readily available for expeditious review, accessible in hard copy or electronic form for 5 years after the date of each occurrence, measurement, maintenance, corrective action, report or record. [40 CFR 63.10(b)(1), 40 CFR 63.10(f), and 40 CFR 63.6660]

Compliance Methods for the Above (Description and Citation):

Records are maintained for the required 5 years or longer.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LCC-3 and LCC-4 & LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ - F. Reporting Requirements

The permittee must report all deviations as defined in 40 CFR part 63, subpart ZZZZ in the semiannual monitoring report required under the Facility-Wide Reporting Requirements Section of this permit. [40 CFR 63.6650(±) and 40 CFR 63.6640(e)].

Compliance Methods for the Above (Description and Citation):

Semiannual reporting requirement is submitted each 6 month period.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s):

Permit Term (Describe requirements and cross-reference)

IV. Facility-Wide Requirements [40 CFR 71.6(a)(1)]**A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]**

1. If the Permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants (HAPs) is not subject to a relevant standard or other requirement established under 40 CFR part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]

Compliance Methods for the Above (Description and Citation):

Records are maintained, as applicable, in accordance with recordkeeping requirements of [40 CFR 71.6(a)(3)(ii)]

Status (Check one): ☒ Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): LCU 2-6GX D-1

Permit Term (Describe requirements and cross-reference)

IV. Facility-Wide Requirements [40 CFR 71.6(a)(I)]

A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]

2. The permittee is the owner or operator of a glycol dehydration unit that is exempt from the control requirements under §63.764(e) (Unit LCU 2-6GX D-1). The permittee shall retain each determination used to demonstrate that actual flowrate of natural gas throughput is less than 85,000 scm/day (3,000,000 scf/day) or the actual average benzene emissions are below 1 tpy. [40 CFR 63.764(e)(I), 63.772(b)(2) and 63.774(d)(I)]

Compliance Methods for the Above (Description and Citation):

Records of flowrates are continuously tracked and maintained.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s):

Permit Term (Describe requirements and cross-reference)

IV. Facility-Wide Requirements [40 CFR 71.6(a)(I)]

A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]

3. Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.

Compliance Methods for the Above (Description and Citation):

Records are maintained for periods of 5 years or longer in electronic and/or hard copy format. Records are kept as required in [40 CFR 71.6(a)(3)(ii)].

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s):

Permit Term (Describe requirements and cross-reference)

IV. Facility-Wide Requirements [40 CFR 71.6(a)(I)]

B. Reporting Requirements [40 CFR 71.6(a)(3)(iii)]

Compliance Methods for the Above (Description and Citation):

Facility is in compliance the reporting requirements of this Title V permit.

Status (Check one): ☒ Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): ALL

Permit Term (Describe requirements and cross-reference)

V. General Provisions

A- P

Compliance Methods for the Above (Description and Citation):

The facility is in compliance with the General Provisions established by the issued Title V permit.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

C. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

Report all deviations from permit terms (whether reported previously or not) that occurred during the permit term. Cross-reference deviations already reported in the six-month report. Indicate whether each deviation is a "possible exception to compliance." Start and end period of each deviation should be in mo/day/yr, hr:min format (24-hour clock). Also, specify the date when the written deviation report was submitted (If written report required, but not submitted, leave the date field blank).

Permit Term for Which There was a Deviation:
maintenance inspection required under §63.773(b)

Emission Units (unit IDs): Thermal Oxidizer

Deviation Start ____/____/____ ____:____ End: ____/____/____ ____:____

Date Written Report Submitted ____/____/____

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____/____/____ ____:____ End: ____/____/____ ____:____

Date Written Report Submitted ____/____/____

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____/____/____ ____:____ End: ____/____/____ ____:____

Date Written Report Submitted ____/____/____

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____/____/____ ____:____ End: ____/____/____ ____:____

Date Written Report Submitted ____/____/____

INSTRUCTIONS FOR A-COMP ANNUAL COMPLIANCE CERTIFICATION

Information Collection Burden Estimates

The public reporting and recordkeeping burden for this collection of information is estimated to average 247 hours per respondent per year. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

DETAILED INSTRUCTIONS

Submit this form along with a certification of truth, accuracy and completeness by a responsible official on an annual basis.

Section A (General Information)

Name and address should be consistent with information provided previously. The contact person should be a person familiar with the day-to-day operation of the facility, such as a plant site manager or other individual, who should be available to be contacted by the permitting authority. If there is more than one contact person, list the others on an attachment.

The reporting period must be at least every 12 months, but your permit may require this more frequently.

Section B (Compliance Status)

Description of Permit Term: Include each permit terms that imposes a requirement or action (emission limitations, standards, monitoring, recordkeeping, reporting, and other requirements on one or more emission units or on the facility. You will likely have to complete this section numerous times to include all requirements in the permit.

The emissions unit ID(s) should be those defined in the permit or in section I of form GIS. If the requirements, including compliance methods, apply in the same way to multiple emission units, you may list multiple units for a particular requirement. Emission units and requirements may be grouped if they apply the same way at all units in the group, the same compliance methods apply to all, and all units have the same compliance status.

Citations to the requirements should unambiguously identify the permit term to the lowest level.

Compliance Methods: List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the permit term described above. Also, describe and cross-reference these compliance methods.

To describe monitoring, indicate the monitoring device, what is being monitored, averaging time, frequency, and cross-reference the permit term. To describe recordkeeping, describe the records kept, collection frequency, and cross-reference the permit term. Please indicate if monitoring data results or compliance records are kept on-site rather than reported. To describe reporting requirements, describe what is reported, when it is reported, and cross-reference the permit term.

The citation or cross-reference here must unambiguously identify the requirement to the lowest level.

Compliance Status: For each permit requirement and its associated compliance methods, indicate whether there was intermittent or continuous compliance (check one) during the reporting period. You should consider all available information or knowledge that you have when evaluating this, including compliance methods required by the permit and “credible evidence” (e.g., non-reference test methods and information “readily available” to you). You are always free to include written explanations and other information to clarify your conclusion regarding compliance status.

You must include permit terms that were not effective or not applicable (e.g., future-effective requirements, compliance options, and alternative scenarios). You may certify to continuous compliance for these if there is no evidence of noncompliance.

Absent evidence to the contrary, you may certify continuous compliance based on the data provided by the compliance methods, provided you did not fail to perform them and there were no unexcused deviations. Any failure to meet any permit term for any period of time indicates intermittent compliance. You may also indicate “undetermined compliance,” if you include the reason.

Section C (Deviations From Permit Terms and Conditions)

Summarize all deviations from permit terms that occurred since the last compliance certification. They may have been reported previously in-writing or they may be reported concurrently with this certification. Also include any deviations but have not yet been reported in writing.

Copy this page as many times as necessary to include all deviations that occurred during the reporting period for this compliance certification.

Deviations occur when any permit term is not met, including emission limitations, standards, monitoring, recordkeeping, reporting and other requirements. For a more detailed explanation of the term “deviation.” See the instructions for Form **SIXMON**. A deviation is not necessarily a violation. Violations are determined by EPA (or its delegate Agency).

You may cross-reference deviations previously reported (e.g., in 6-month monitoring reports).

You must indicate whether each deviation is a “possible exception to compliance.” This is a deviation that occurs when compliance is required. A deviation that is not a “possible exception to compliance” is one that occurs when compliance is not required or it is excused by another permit term. If you indicate that a deviation is not a possible exception to compliance, briefly explain and cross-reference the permit term that allows or excuses it. In addition, deviations for which the permit provides an affirmative defense (e.g., emergencies) must be identified as “possible exception to compliance” because only the permitting authority may determine if the affirmative defense applies.

If the cross-reference a deviation report that does not contain all the information requested here, you must supplement it accordingly.

You may list multiple emission units if they all had the same deviation during the same time periods. In addition, for deviations that impose requirements to the permitted facility as a whole or to all units at your facility, you may enter facility-wide in the emissions unit column.

You may indicate continuous periods of deviation that span multiple days in a single entry. Use the 24-hour clock (equivalent to military time) for reporting these times (e.g., the day starts and ends at midnight, 12 a.m., or 00:00 in military time).

Specify the date when the written deviation report was submitted to the permitting authority. Leave the date field blank if you did not submit a written deviation report during the reporting period covered by the six-month monitoring report (whether required to do so or not). It is a deviation to fail to submit a required deviation report.

Form CTAC (Certification of Truth, Accuracy, and Completeness by Responsible Official)

You must complete form **CTAC** and attach it to this annual compliance certification.